

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DR. RABBI K.A. ISRAEL,)	
)	
Plaintiff,)	
)	
v.)	07 C 7084
)	
CIRCUIT COURT OF COOK COUNTY,)	Judge Charles R. Norgle
ILLINOIS, et al.,)	
)	
Defendants.)	

PLAINTIFF'S COUNSEL'S MOTION TO WITHDRAW AS COUNSEL

Harry N. Arger and Molly E. Thompson, attorneys for Plaintiff, Dr. Rabbi K.A. Israel, hereby move to withdraw as Plaintiff's counsel, and in support, state:

1. Harry N. Arger was appointed to represent Plaintiff on February 1, 2008. Molly E. Thompson subsequently also filed her appearance on behalf of Plaintiff.

2. Plaintiff has recently informed Plaintiff's counsel that he would like them to withdraw as counsel so that he may proceed *pro se*. In addition, Plaintiff's actions, such as his direct contact with the Court regarding his case without counsel's involvement or knowledge, have compromised the attorney-client relationship. Because of Plaintiff's desire to proceed *pro se* and the compromised attorney-client relationship, Plaintiff's counsel believes they are unable to effectively and properly represent Plaintiff. For these reasons, Plaintiff's counsel seek to withdraw their appearance on behalf of Plaintiff.

3. There are no responsive pleadings currently pending and Plaintiff has been granted leave until June 27, 2008 to file an amended complaint. Plaintiff has informed his counsel that he would like to file an amended complaint *pro se*.

4. Plaintiff's counsel have taken their representation of Plaintiff earnestly and regret they are not able to fully execute their duties in this regard. To the extent Plaintiff may have a federal claim yet to pursue, Plaintiff's counsel will gladly share their work product with Plaintiff, or any subsequent counsel for Plaintiff.

5. Plaintiff's counsel have discussed the issues regarding their withdrawal and their opinion of Plaintiff's case with Plaintiff and Plaintiff does not object, and in fact requests, counsel's withdrawal from his case. Plaintiff will be present at the hearing of this motion.

WHEREFORE, counsel, Harry N. Arger and Molly E. Thompson, respectfully request that this Court grant Plaintiff's Counsel's Motion to Withdraw and for any other relief for Plaintiff that this Court deems reasonable.

Respectfully submitted,

Harry N. Arger
Molly E. Thompson
Dykema Gossett PLLC
10 South Wacker Drive, Suite 2300
Chicago, Illinois 60606
312.876.1700 (phone)
312.627.2302 (facsimile)

s/Harry N. Arger (ARDC No. 6198806)
s/Molly E. Thompson (ARDC No. 6293942)

Attorneys for the Plaintiff Dr. Rabbi K.A.
Israel

CERTIFICATE OF SERVICE

I hereby certify that on June 11, 2008, I electronically filed the foregoing **Motion to Withdraw** with the Clerk of the Court using the ECF system, which sent electronic notification of the filing on the same day to:

Kathleen Louise Ford
Illinois Attorney General's Office
100 West Randolph Street
Chicago, IL 60601
(312) 814-5160
Email: kford@atg.state.il.us

Paul W. Groah
Cook County State's Attorney
500 Richard J. Daley Center
Chicago, IL 60602
(312) 603-6461
Email: pgroah@cookcountygov.com

Michael S. DeLaney
DeLaney Law Offices
14524 John Humphrey Drive
Orland Park, IL 60462
(708) 675-7144
Email: mdelaney@delaneylawoffices.com

s/ Molly E. Thompson (ARDC No. 6293942)
Molly E. Thompson